

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
)
V.) Case No. 3:09-00218
)
VAZGEN FAKHOORIAN.) Chief Judge Haynes

*Docket
Turnaround
encl. and filed
FBI
5-6-13*

MOTION TO EXTEND PLEA DEADLINE

Comes now the Defendant, Vazgen Fakhoorian, by and through counsel, and would move the Court for an extension of the plea deadline in this case until Monday, May 20, 2013. Counsel and the Defendant will be present at the status hearing currently set for Friday, May 3, 2013 at 1:30 and does not seek to continue the hearing.

We would submit that plea negotiations are ongoing and counsel and that a plea agreement may very well be worked out in the case. Due to language barriers in both meeting with Mr. Fakhoorian as well as the need to translate any plea agreement into Farsi counsel would submit that the existing deadline would not provide enough time.

Counsel has communicated with the United States Attorney's Office concerning this Motion for an extension of time and they have expressed no opposition.

Therefore, Counsel would respectfully move the Court to extend the plea deadline until Monday, May 20, 2013 at a time convenient with the Court's docket.¹

¹ Counsel starts a two (2) to three (3) week jury trial in the case of *United States v. Medlock*, TNMD case No. 3:10-00004 on May 21, 2013, and therefore would be unavailable any other day during the week of May 20, 2013.